

GPC Webcast Questions and Answers

October 30, 2007

Objective

This document provides a summary of the Questions and Answers section of the October 30 Grants Policy Committee (GPC) Webcast.

Introduction

The GPC is a committee of the U.S. Chief Financial Officers (CFO) Council. The Office of Management and Budget (OMB) sponsors the GPC. Its membership consists of grants policy subject matter experts from across the Federal Government.

The GPC is charged with improving the management of federal financial assistance government-wide. To carry out that role, the committee recommends financial assistance policies and practices to OMB and coordinates related interagency activities. The GPC serves the public interest in collaboration with other federal-wide grants initiatives.

The GPC hosts quarterly webcasts to inform the grants community of current grants related issues as well updating them on GPC workgroup activities.

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Grants Streamlining

1. Why is it taking so long to streamline policy around grants and cooperative agreements?

It takes time to ensure that all agencies are able to contribute comments to the process and address each issue. This process requires us to revisit issues frequently. For example, one agency was not involved during initial discussions of the report format for invention. Once that agency came to the table we were able to take their suggestions into consideration and consequently improve the policy.

There are also OMB legal requirements that must be taken into consideration. Statutes must be met or altered and this involves working with our stakeholders in Congress. Once agency policy is determined internally, each agency has to work with its stakeholders in Congress to try to get the new changes to their mission updated in the legislation.

2. Why does it seem like so many agencies are working on the same thing within the grants streamlining process?

We understand that it seems like many agencies are working on the same thing. There are many areas within grants and many areas of grants management implementation in which representation across agencies is vital.

3. I am somewhat concerned that the streamlining requirements have not flowed down to the same extent at the State and Recipient level. When would this take place within your Strategic Plan, as the success or failure of the process will largely depend on these same requirements flowing down from the Federal Government?

There are two main issues that need to be addressed. First, one of the reasons for the length of time involved has been the goal of inclusiveness for federal grant programs in all aspects of this process. The process itself has involved everything from announcements via Grants.gov to close-outs and audits. When completed, the goal is to streamline and standardize virtually all aspects of grants administration so that every applicant is on a level playing surface with all other applicants. Once we are successful, a recipient will be able to expend most of its grant related resources to address the funded service, research, assistance, etc., because the administrative and reporting aspects will be simplified and standardized. Including everyone in this process has taken time.

Second, as we move into the latter stages of the process, we are including states, universities, and non-profits more to ensure that the outcomes will be reflective of their concerns as well. One reason for the length of time has been the magnitude of the task and the desire to ensure participation and input whenever possible. We fully expect a more robust dialogue among federal and non-federal partners as we continue with the streamlining effort.

4. How will you ensure that the Strategic Plan is implemented if P.L. 106-107 ends next month?

The goal of P.L. 106-107 was to improve the effectiveness and performance of Federal financial assistance programs; to simplify Federal financial assistance application and reporting requirements; to improve the delivery of services to the public; and to facilitate greater coordination among those responsible for delivering such services. Although P.L. 106-107 has sunset, the Federal Government remains committed to these goals. Federal grants streamlining work will continue to be coordinated through the GPC and approved by OMB. Nothing has changed.

Standard Forms and Reports

5. Reviewing the Performance Progress Report, there are a number of different sections and types of instructions. Will I be required to complete them all once this format has been adopted?

No, completion of all the reporting forms will not be required. In general we have created a format for completing the Performance Progress Report. There is a narrative section and a performance accountability section which is a series of questions. Agencies will ask recipients to complete very specific parts of the Report.

6. Will all of the reporting forms you are creating gradually replace program specific reports now required by agencies for real property, personal property, etc.?

Yes, we are currently working to create one form that will capture the essential information. Ideally each agency will begin to use these standard forms and the forms will work for all agencies.

GPC Activities

7. What is the status of the Single Audit Quality Review Report? What action will the GPC be taking as a result of it?

The report has been issued. The Audit work group is addressing four parts of the report:

- The group is working to add more substance to the report around education requirements for auditors that do A-133 audits. Currently, there are no requirements for training.
- The team is also working with American Association of Certified Public Accountants (AICPA) to change reporting requirements with respect to sample sizes, documentation compliance, and inefficiency. The appropriate changes will then need to be made in A-133.
- The work group plans to strengthen the requirements for qualified auditors. Currently there is no training required. The team intends to set up the appropriate training courses, and the group is also open to input for what types of courses would be best.
- Finally the work group is addressing the consequences for auditors who incorrectly complete the reports.

8. The National Grants Management Association (NGMA) and possibly other organizations are developing a Certified Grants Management Program that will cover not only Federal Government employees but others in the grants management field as well. Will these programs have an impact on how the Training and Certification Workgroup will develop their training and certification requirements?

Right now we are focusing solely on creating criteria and competencies for the federal grants management specialist. In the future, our goal is to create an opportunity to collaborate with NGMA on grant management requirements and training for the whole community.

Essentially, we have to work through the Office of Personnel Management because they have certain requirements that we have to meet from the federal side. It is also important to note that each state has its own requirements and in the future we will have to evaluate how well each of the states' requirements mesh with the federal requirements.

9. How do you ensure that the products on the Potential Products List get implemented?

The only way to confirm that products get implemented is to see the work that is being published. When products are published, the work put into them will be evident. For example, we are looking to publish the Code of Federal Regulations Part II document within a year. At this point it is about 95% complete.

10. How does it help us to get the Code of Federal Regulations Part II (2 CFR) published?

Publishing 2 CFR has multiple advantages. First, it consolidates in a single location the OMB guidance to agencies on grants and agreements. Second, it co-locates in the same title of the CFR the agencies' rules implementing that OMB guidance, rules that now are located in several different CFR titles.

Linked with the publication of 2 CFR is another innovation, which is to replace Government-wide common rules with OMB guidance that agencies can adopt with very brief regulations. Not having 30 or more agencies separately publishing the full text of a common rule greatly reduces the volume of federal grants rules. We've nearly completed the replacement of the common rule on nonprocurement suspension and debarment, with the OMB guidance published at 2 CFR part 180 and many agencies having issued their short adopting regulations in 2 CFR, Subtitle B. We plan to replace other Government-wide common rules in the future.

11. Will the GPC help develop standardized mandatory training, along with recommended certified vendors?

One of the tasks of the Training and Certification Workgroup is to develop a required training course for Federal Grants Management Certification. Once that is accomplished we will be open to working with organizations that are interested in developing those training courses. Although we could not promote any single organization, we would be able to develop a list of organizations that the Federal Government will be using to train their cadre of grants management employees.

The GPC and Federal Funding Accountability and Transparency Act (FFATA)

12. How does FFATA affect grantees and how should we get the word out about the FFATA data submission requirements that are due at the end of the year?

FFATA mandates that grants data be posted on a publicly searchable website on January 1, 2008. At present, the requirements are not widely understood or acknowledged across the national grants community.

Our recommendation is to use existing agencies to get the word out about the upcoming FFATA requirements. Anyone who knows about FFATA should spread the word to their recipient and sub-recipient stakeholders. In addition, you could invite Federal employees who know about FFATA to come and speak to your organizations.

The challenges with the public awareness and implementation of FFATA are as follows:

- Many grantees are not aware that the grant's sub-recipients need to be captured.
- The questions around who is responsible for capturing the sub-recipient data and maintaining its integrity have not been definitively answered by the FFATA Task Force. The responsibility may ultimately be placed upon the grant recipients to document and update their sub-recipient information.
- Not all agencies have a program source for grants data.
- Agencies do not always collect data regarding the location where the actual research is being performed (oceanographic research, matters of national security, etc.).

13. Why is it important for Government spending data to be publicly available?

Publishing this data demonstrates where federal dollars are being spent. In addition, it can help citizens use the information to anticipate upcoming job opportunities.

14. What is the GPC's role in FFATA?

The GPC is responsible for looking at new data requirements and learning if data is already captured under current grants management systems. If not, then the GPC considers how it will be uniformly captured. Our role is to ensure that the required data can be captured during the award stage so that when the data is requested we have already captured it.

- 15. I realize this is more than just a Grants Policy Committee issue, but few people understand these issues as well as the GPC members. Has the team working on FFATA implementation tried to engage the Census Bureau on the current data requirements already on the books (there are many)? This seems like an ideal opportunity to clean up some existing systems, and actually save money by avoiding the creation of something completely new.**

Yes, we are engaging the Census Bureau in the data collection process. The goal is to move away from FAADS data as soon as possible. That said, in order to meet the spirit of the law, we will use the FPDS and FAADS data concurrently until a more streamlined system is fully functional.

Grantee Participation

- 16. Can the GPC provide a mechanism for grantee involvement so that we can provide our views at the time the policy is developed, long before the documents are published in the Federal Register?**

The Federal Register is the standard mechanism for communicating with the community. Proposed policy is published as a draft and it is open for comments and suggestions from the community. The draft is then reconciled with the community's comments and either another draft is produced or we proceed to the final copy, depending on the circumstances.

We have also been communicating with grantees via webcasts, email, and are currently improving our website. We seek to maximize valuable input from the grantee community as early as possible within the boundaries of applicable law.

- 17. How can we educate the grantee community on non-government business processes?**

AGA has developed a new initiative called the Partnership for Intergovernmental Management and Accountability co-chaired by the CFO of Massachusetts. They will be addressing business processes. Tom Cooley will be present at the next professional development conference in February and he will make an effort to get state representatives to participate in panels and discussions.